



ARIZONA DEPARTMENT OF TRANSPORTATION



HIGHWAY DIVISION

206 South Seventeenth Avenue - Phoenix, Arizona 85007-3213

FIFE SYMINGTON
Governor

LARRY S. BONINE
Director

RECEIVED

MAY 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

GARY K. ROBINSON
State Engineer

DOCKET FILE COPY ORIGINAL
RECEIVED

MAY 26 1993

May 25, 1993

FCC MAIL BRANCH

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M. St. NW, Room 222
Washington, D.C. 20554

RE: PR Docket No. 92-235 - Spectrum Refarming

Dear Ms. Searcy:

The Arizona Department of Transportation (ADOT) wishes to provide brief comments to the Commission's plan for "Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify Policies Governing Them (PR Docket 92-235)." The ADOT operates approximately 35 VHF base/mobile relay stations around the State, interlinked by microwave to communicate with approximately 2000 mobile and 200 portable radios. This system operates in the Highway Maintenance subpart of the Public Safety Radio Service.

This system provides essential communications to our maintenance and construction personnel scattered statewide, some of whom in the Motor Vehicle Division are sworn, law enforcement officers. This system is essential to their own personal safety and welfare, as well as protecting the public's interests in maintenance of safe roads throughout Arizona. This system is used to coordinate removal of snow and ice, and landslides on public highways. Therefore, we feel that the Highway Maintenance Radio Service is as important as the police and fire services in the provision of services relating to the public's safety.

First, in general, the ADOT supports the comments of Arizona APCO, Inc. We also specifically support the comments of the Arizona Dept. of Public Safety (ADPS), which supports our radio communications system.

No. of Copies rec'd _____
Listed as _____

Ms. Donna Searcy
Page 2
May 25, 1993

We are especially concerned that the FCC's proposed rewrite would not only impose an extreme cost hardship on this agency, but would also destroy the integrity of our radio system. Replacement of our radio equipment which would be obsolete by January 1, 1996, should the Commission's existing plan be implemented, would cost ADOT over \$4,000,000. In addition, if additional new sites were to be added to the system to replace lost coverage, costs would run into the tens of millions of dollars. We address our specific concerns to the following:

1. Reduction of ERP to an unacceptable level (5 watts)
2. Obsoleting of base and mobile radios on 15 KHz channels
3. Potential interference from stations on adjacent channels
4. Reduction in recovered audio power from low deviation

We believe that these concerns are addressed by the ADPS adequately in proposing:

1. ERP levels based upon dBu over user service areas
2. A separate part in the rules strictly for Public Safety
3. Extended 10 year implementation schedule
4. Grandfathering existing equipment in rural areas
5. Establishing a regional planning process below 470 MHz
6. Limiting channel bandwidths to 12.5 KHz

In summary, we urge the Commission to go slow when imposing new rules on public safety entities which will result in the obsolescence of equipment, and reduction of system operating levels. We believe that the Communications Act of 1934, as revised, require the public safety and welfare be provided with adequate spectrum and power levels to provide needed services to the public.

Respectfully Submitted,



DAVID R. OLIVAREZ, P.E. Manager
Traffic Operations Services
Arizona Dept. of Transportation

DRO:res